

EXHIBIT A

From: Wells, Gregory F. [gregory.wells@bingham.com]
Sent: Friday, June 20, 2008 11:21 AM
To: Landau, Brent
Cc: Small, Daniel; Ripley, Richard A.; Pickett, Donn
Subject: RE: Correspondence re: Intel Litigation

Mr. Landau-

This will confirm my voicemail message in response to your protocol, which is unacceptable to Intel. The Federal Rules require that this information be produced in conjunction with the expert report, which was submitted by plaintiffs on May 16th. Your proposed protocol requires Intel to produce the backup information the day after it files its expert report, but plaintiffs have built in a two-month window between producing their expert report and producing the backup data, which appears to serve no purpose other than to deprive Intel of discovery that it is legally entitled to.

We will allow plaintiffs to produce this data by June 25, 2008, otherwise we will seek relief from the Special Master. As I mentioned on my voicemail, we intend to raise this issue with the Special Master in today's 2 PM Eastern call, so please let me know plaintiffs' position on the 6/25 production date in advance of that call.

Gregory F. Wells
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From: Landau, Brent [mailto:BLandau@CMHT.com]
Sent: Friday, June 20, 2008 10:05 AM
To: Wells, Gregory F.
Cc: Small, Daniel; Ripley, Richard A.
Subject: RE: Correspondence re: Intel Litigation

Dear Mr. Wells:

I am writing to follow up on your letter and subsequent conversation with Dan Small regarding a protocol for expert discovery related to class certification. Below is the protocol we propose. Please let me know your comments. Thank you.

EXPERT DISCOVERY PROTOCOL

1. This protocol will govern discovery of experts proffered in support of or in opposition to class certification in *In re Intel Corp. Microprocessor Antitrust Litig.*, MDL No. 05-1717-JJF (D. Del.).
2. On or before the earliest date set in the Stipulation and Order Regarding Class Certification Briefing and Discovery (D.I. 967) for the deposition of a party's expert, the party proffering that expert will produce all documents and backup data used or considered by the expert in forming his or her opinions.

3. Documents produced in this litigation need not be produced again unless they have not been made available to the other party. The parties agree to meet and confer about sharing the costs incurred in obtaining the production and to present the issue to the Special Master if they are unable to agree.
4. Documents that are publicly available at no or minimal cost need not be produced. Such documents will be produced, however, if a party gives notice that they have been unable to obtain the documents with reasonable effort or without significant expense.
5. The backup data to be produced will consist of all data, programs, spreadsheets, and calculations used or considered in creating the exhibits and text of the report.
6. The backup data provided will include the original data along with any data and/or spreadsheets that are manipulations of the original data necessary to replicate the calculations in the exhibits and text to any submission by the expert.
7. No party will produce materials protected from disclosure by the Amended Stipulation and Protective Order Regarding Expert Discovery (D.I. 474).



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-----Original Message-----

From: Wells, Gregory F. [mailto:gregory.wells@bingham.com]
Sent: Tuesday, June 03, 2008 5:46 PM
To: Small, Daniel
Cc: Ripley, Richard A.; Pickett, Donn; Hann, Bree
Subject: Correspondence re: Intel Litigation

Mr. Small-

Please find attached correspondence regarding the Intel litigation.

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